

2. The proposed Response is attached, and great prejudice will result to Plaintiffs if they are unable to respond to Defendants' arguments.

WHEREFORE, the Plaintiffs, Second Amendment Arms (a d/b/a of R. Joseph Franzese), R. Joseph Franzese, individually and d/b/a Second Amendment Arms, Robert M. Zieman, Sr., and Tony Kole, request this Honorable Court to grant Plaintiffs leave to file their Response to Defendants' Citation to Additional Authority, *instantly*, as well as any and all further relief as this Court deems just and proper.

Dated: June 10, 2015

Respectfully submitted,

By: /s/David G. Sigale
David G. Sigale

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CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

1. On June 10, 2015, the foregoing document was electronically filed with the District Court Clerk *via* CM/ECF filing system;
2. Pursuant to F.R.Civ.P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

/s/ David G. Sigale
Attorney for Plaintiffs

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